

Orig: Mine File
cc: D. Wham
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July 17, 1987

TO: Lowell P. Braxton, Administrator
FROM: David M. Wham, Reclamation Hydrologist *DWW*
RE: Desert Mound Mine Waste Dump, USX Corporation, M/021/003, Iron County, Utah

This memo is a follow-up of our conversation concerning the question of the Division's position on the regrading of the above referenced mine dump. As you will recall, the waste dumps in question are very large, with faces (100 ft high) at the angle of repose. Because the system is constantly unraveling, there is little or no revegetation success on the slopes. Although leaving waste dumps in this unstable, unreclaimed condition is clearly not consistent with the letter and intent of the Act, we noted that previous Division decisions may have effectively bought off on further regrading requirements for these dumps.

I conducted a file review to determine our position on this question. Basically, through failing to address this question in the review process, the Division has approved the current configuration of the dumps. The original plan submitted by U.S. Steel called for rounding the dumps edges to "a pleasing configuration" and keeping the slope under 40 degrees. This has been done.

The main issue concerning the dumps has been a concern about the possibility of mass failure, as several tension cracks have developed on the dump pad. The cracks are currently being monitored by the company, and no further movement has been noted (cracks probably developed due to initial settlement and consolidation).

Due to periods of inactivity, this mine has a unusually long permitting history (initial submittal 10/76, final approval 5/82). Although much correspondence has gone back and forth concerning final reclamation at the site, a key February 16, 1984 letter from Jim Smith entitled "Final Reclamation Concerns for the Desert Mound Mine" addressed the dump faces as follows:

Stability of waste dump side slopes may not be significantly improved by reclamation efforts, especially due to the large diameter waste rock gravel and boulders present. Therefore, revegetation of all side slopes is not recommended in this case.

The Division has eluded to requiring a reduction in the dump slope angle only in relation to the mass failure issue. Through reviewing the files, it is clear to me that neither the Division or the operator intended to reduce the dump slopes to anything less than the angle of repose. I recommend that we honor our previous agreements on this site and require no further slope reduction. *I support this recommendation*

LOS 7-23